

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

WEIHAI TEXTILE GROUP IMPORT &
EXPORT CO., LTD.,

Petitioner,

v.

ERUPTION HOLDINGS, INC.,

Respondent.

Case No.: 2:21-MC-00147-SWS

EXHIBIT A

AFFIDAVIT OF JOHN LEGGE

**RESPONSE IN OPPOSITION TO
MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY**

John Legge, being of legal age, sound mind, and duly sworn, hereby swear and testify as follows:

1. I have read and understand the following information, including its accompanying exhibits, and that as presented in the *Response in Opposition to Motion for Leave to Conduct Limited Discovery*. To the best of my knowledge and ability, I verify and swear, under penalty of perjury, the same to be true and accurate.

2. Eruption did provide Mr. Liang with an e-mail address.

3. I had intended for this gesture to assist with communications regarding Eruption's order with the Feimann Group in March of 2018. Nothing more.

4. Despite providing the e-mail address, I did not authorize Mr. Liang to represent

Eruption in any manner whatsoever.

5. Eruption's order (entirely unrelated and prior to this matter) with Feimann Group, the wire transfer, and the e-mail address constitute the entirety of the relationship between Eruption and Mr. Liang.

6. No other relationship exists between Mr. Liang and myself and/or Eruption.

7. In reviewing the pleadings in this matter my e-mail address does not appear in the record until December 28, 2018.

8. Unfortunately, I did not afford this message any attention as neither I nor Eruption had dealings in China or with a Chinese-based provider.

9. The first time Eruption came to realize an issue was brewing, and a fraud had been committed, was upon contact from Brown & Joseph, which was delivered to my home address. Please see **Exhibit 1**, attached hereto and incorporated by reference, depicting a true and accurate copy of the mailing envelope delivered to my personal residence.

10. I understand Petitioner claims I have reviewed additional or new materials in this matter. This is not accurate.

11. The purported additional files were those items previously provided in the Brown and Joseph mailing in mid-2019.

12. No other "new" documents have been received.

13. In 2019, I reviewed the materials provided by Brown and Joseph.

14. In 2021, I again reviewed those materials to respond to Petitioner's confirmation request.

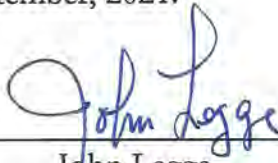
15. With the context of the litigation shedding a different light on the matter, certain materials resonated differently with me than they had in 2019.

16. Having promptly, truthfully and completely responded to the 2019 request, I felt the matter was fully resolved and no further correspondence was received – either from Brown and Joseph or from the purported arbitrator.

17. I have read and understand the foregoing information, including its accompanying exhibits, and that as presented in the *Response in Opposition to Motion for Leave to Conduct Limited Discovery*. To the best of my knowledge and ability, I verify and swear, under penalty of perjury, the same to be true and accurate.

Subscribed and sworn to this 10th day of September, 2021.

Signed:



John Legge

- *A true and accurate copy of the California Notarization Confirmation Page Follows* -

California Jurat Certificate

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California

County of Orange

} s.s.

Subscribed and sworn to (or affirmed) before me on this 10th day of September,
Month

2021, by John Legge _____ and
Name of Signer (1)

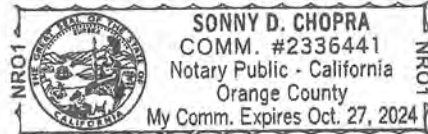
_____, proved to me on the basis of
Name of Signer (2)

satisfactory evidence to be the person(s) who appeared before me.

[Signature]
 Signature of Notary Public

Sonny D. Chopra #2336441

For other required information (Notary Name, Commission No. etc.)



Seal

OPTIONAL INFORMATION

Although the information in this section is not required by law, it could prevent fraudulent removal and reattachment of this jurat to an unauthorized document and may prove useful to persons relying on the attached document.

Description of Attached Document

The certificate is attached to a document titled/for the purpose of

Affidavit of John Legge

containing 4 pages, and dated 09/10/2021

Additional Information

Method of Affiant Identification

Proved to me on the basis of satisfactory evidence:
☐ form(s) of identification ☐ credible witness(es)

Notarial event is detailed in notary journal on:

Page # _____ Entry # _____

Notary contact: _____

Other

☐ Affiant(s) Thumbprint(s) ☐ Describe: _____

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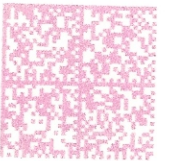
AFFIDAVIT OF JOHN LEGGE

**RESPONSE IN OPPOSITION TO
MOTION FOR LEAVE TO CONDUCT LIMITED DISCOVERY**

EXHIBIT 1

OWN & JOESPH LLC
P.O. BOX 59838
LAUMBURG IL 60159

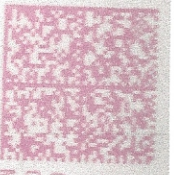
ERUPTION HOLDINGS INC.
c/o John Lege
1139 E. ALLISON CIR.
ORANGE, CA 92664



UNITED STATES POSTAGE
PITNEY BOWES
02 1P
0000908037
\$ 002.20
SEP 09 2019
MAILED FROM ZIP CODE 60143

BROWN & JOSEPH LLC
P.O. BOX 59838
SCHAMBURG IL 60159

EMPHON HOLDINGS INC
c/o John Lege
1139 E. ALLISON CIR.
ORANGE, CA 92669



02 1P
0000908037
MAILED FROM ZIP CODE 601

\$ 002.21
SEP 09 2021

